78. In conclusion, SWBT has presented evidence that it has implemented substantial up-front editing capabilities at the express request of the CLECs. Those editing capabilities result in less manual handling of LSRs by SWBT, and – together with LASR GUI – provide CLECs with the ability to monitor and trend errors, train service representatives in accurate LSR submission and develop their own editing capabilities. SWBT further has demonstrated that any CLEC can substantially reduce its reject percentages based on the care it takes in order submission. SWBT's reject rates and up front edits contribute to SWBT's provision of efficient access to OSS that meets or exceeds the requirements of the Act

CLEC SYSTEM COMPLAINTS

79. This section addresses CLECs' complaints related to SWBT's OSS. Issues already discussed above will not be readdressed.

Elimination of Address Requirement on Conversions

80. In a Process Improvement effort and in response to a CLEC Change Request submitted by MCI WorldCom, SWBT has notified CLECs through an Accessible Letter (*See* Ham Supplemental Affidavit, Attachment I) that, as of May 27, 1999, CLECs will no longer be required to populate the End User Service Address on the LSR for Conversion ("V") activity. The End User Service Address will continue to be required for New ("N") activity. Ham Supp. Aff. ¶¶ 24-32. Changes will be made to LASR to remove edits that require these fields to be populated when the activity and all associated line activity is

"V" with the exception of xDSL loops. SWBT will automatically populate the address on the resulting service orders (the "N," "C," and "D" orders) from the existing CSR. Id.

81. MCI WorldCom alleges that CLECs will require population of an address on CLEC orders requesting a change in customers' features. MCI WorldCom estimates (based on New York volumes) that it will be submitting orders to change a customer's service for more than 15% of its customers each month. McMillon/Silvori/Lichtenberg Supp. Decl. ¶ 35. If MCI WorldCom had brought its concerns to its Account Manager or to the Change Management team, MCI WorldCom would have learned that the customer's service address on a change of features is not required. In fact, if MCI WorldCom were to submit a request for a feature change today, the customer's address is not required. *See* Attachment P (LSOR page 304) (Proprietary).

82. MCI is further concerned that a CLEC will not be able to submit a trouble ticket, because a customer's service address must be provided on each trouble ticket. McMillon/Silvori/Lichtenberg Supp. Aff. ¶ 36. There is NO instance for which SWBT requires a customer's address on a trouble ticket in Toolbar Trouble Administration ("TBTA"). A trouble ticket is entered by using the customer's telephone number or circuit ID. Even in those cases wherein a CLEC submits a trouble ticket via TBTA on a *conversion* order before the order has posted to billing,[24] an address is not required. In those cases wherein a CLEC submits a trouble ticket on a *new* account before the order has posted to billing, an error would be returned "TN not found" and the CLEC would have to call the LOC to report trouble, in parity with retail.

[24] SWBT implemented an enhancement to TBTA in February 2000 that provides the CLECs with the ability to create trouble tickets on or after the service order due date.

83. In response to SWBT's assertion that parsed address information will not be required on the LSR for conversions (other than xDSL conversions) after the May 2000 EDI/LASR release (Ham Supp. Aff. ¶ 29), MCI WorldCom complains that a CLEC will still need to enter a parsed address into its own back office systems for its own records. Id. ¶¶ 35-37. This "concern" relates to each CLEC's integration to its back office systems, which can only be accomplished by each individual CLEC. Although MCI WorldCom's back office systems may require parsed service addresses, another CLEC's back office systems may store addresses in a concatenated format (as SWBT's back office systems store addresses). MCI WorldCom cannot reasonably expect SWBT to integrate address information to accommodate MCI WorldCom's back offices at the expense of other CLECs, already in commercial production, that have already integrated their back office systems.

84. AT&T notes it is generally supportive of SWBT's proposal to eliminate the address requirement on conversion requests, but expresses "reservations" that SWBT will automatically populate the service address from the CSR. Chambers/DeYoung Supp. Decl. ¶¶ 70, 71. SWBT answered AT&T's concerns at the April 7, 2000, "walk-through" of the initial requirements for the EDI/LASR May release. As explained at the "walk-through" and in my supplemental affidavit, SWBT will automatically populate the resulting three service orders (the "N," "C," and "D" orders) with the end user's address contained in the CRIS database. See Ham Supp. Aff. ¶ 25. Therefore, this will eliminate the possibility of the service address being different on the "C" and "D" orders, which previously had the potential of causing service disruptions. This will be transparent to the CLEC originator of the LSR and will alleviate the possibility of address mismatches

within the three created orders. Ham Supp. Aff. ¶ 31. In addition, at the "walk-through" SWBT responded that if a mismatch occurs between the auto-populated address from CRIS and the address in PREMIS, a "soft" error will detect the mismatch. The LSC will manually create the service orders and reconcile the address mismatch in the CSR and the CRIS database. All conversion LSRs that fall out for address mismatch errors after the May 27, 2000 EDI/LASR release will be counted against SWBT's flow through percentage. There will be no impact on provisioning or billing upon manual correction and submission of the order.

85. AT&T also suggests that if an address is not required it may lead to "unintentional" slamming if an incorrect phone number is entered on the LSR. Id. ¶ 33. *First,* SWBT wants to make it perfectly clear that the telephone number that CLECs will still be required to populate on the conversion LSR is already parsed in the CSR. *Second,* CLECs already face this same situation when submitting a Resale "as is" conversion. In a Resale conversion, the end user's address is not required and if a CLEC were to enter an incorrect telephone number, slamming would result. SWBT has not been made aware of any such problems in Resale conversions. *Third,* a CLEC ultimately needs to take *some responsibility* for the data it submits on its LSRs. This is a prime example that only a CLEC can reduce the errors on its LSRs. If SWBT were to implement some type of edit on the first few numbers and letters of a house and street address (as AT&T suggests in ¶ 70 of the Chambers/DeYoung Supp. Decl.), this edit would most likely add to the rejection rate that AT&T claims is already "excessive." Moreover, it should be obvious that this suggested edit (as well as many other edits currently in use) will "catch" only

CLEC inaccuracies. Furthermore, once again AT&T has failed to submit its request for a new edit through the proper channels.

86. AT&T complains that "the new functionality is not scheduled for implementation until at least May 27, 2000." Id. ¶ 69. Yet, at the same time, AT&T further complains that SWBT's proposed schedule for testing and implementation of this functionality will not allow CLECs to determine its functionality on the production environment. Id. ¶ 72. This proposed enhancement is an exception to the CMP, albeit an exception that is to the benefit of all parties. This proposal was announced two months in advance of the May EDI/LASR release, and SWBT has not abbreviated its release testing period as a result of the address elimination enhancement.

87. Additionally, AT&T asserts that with or without the address requirement, SWBT's retail operations do not experience problems relating to inaccurate addresses to the same extent as CLECs because SORD edits that cause a retail submission to "error out" are automatically detected and returned via the SORD edits program. Id. ¶ 73, footnote 31. This assertion is ludicrous and SWBT can demonstrate that parity exists. *First,* both CLECs and SWBT (not only SWBT, as AT&T suggests) will *never* experience invalid address errors problems (as a result of a CRIS/PREMIS mismatch) on the installation of service for a new account. There is no possibility of a mismatch, as there is no current CSR or CRIS record for a new customer account. *Second,* AT&T has access to SORD and therefore has the present capability to monitor SORD. AT&T's own service representatives can receive the SORD errors and resolve such errors by manually creating AT&T's own orders,[25] in the same manner the LSC will create orders on AT&T's behalf

[25] AT&T would be required to train its service representatives in the use of SORD in the same manner that SWBT trains its LSC and retail service representatives.

and in the same manner the SWBT retail service representative will manually create orders for SWBT's retail operations.

UNE-P Conversions

88. AT&T repeats its arguments about service outages and service degradation in connection with UNE-P conversions. *See generally,* Chambers/DeYoung Supp. Decl. ¶¶ 136-145. However, AT&T fails to present any new evidence on this issue. SWBT addressed AT&T's prior complaint by providing evidence that:

- The three-order process was designed specifically to implement the Texas PUC's requirement that SWBT's billing be affirmatively stopped and that the CLEC's billing be affirmatively commenced. Ham Reply Aff. ¶ 69.
- The TPUC has concluded that SWBT has timely addressed all actual operational limitations caused by the three-order process. TPUC Evaluation at 55.

89. Comp Tel also alleges that the three-order process is discriminatory because it caused numerous instances of feature outages and service degradations in October through December of 1999 for Network Intelligence. Comp Tel Supp. Comments at 3-5. SWBT has fully investigated Comp Tel/Network Intelligence's allegations. SWBT found that the majority of the feature outages listed on Network Intelligence's trouble tickets were not requested on the LSRs it submitted to SWBT. More details on Comp Tel/Network Intelligence's complaint can be found in the supplementary reply affidavit of Brian Noland.

System Availability

90. MCI WorldCom and Z-Tel maintain that SWBT's OSS hours of operation are too limited. McMillon/Sivori/Lichtenberg Supp. Decl. ¶¶ 78-80, Z-Tel Comments at 3, 4. MCI WorldCom submitted a CLEC Change Request on March 20, 2000 requesting extended hours on Sunday for Verigate, LEX and EDI and 24 hours a day, seven days a week access to Toolbar Trouble Administration for trouble ticket reporting. Z-Tel wants access to SWBT's pre-order and order applications to submit requests 24 hours a day, seven days a week. Z-Tel is not suggesting that SWBT staff its operations "24x7." Z-Tel further maintains that "If SWBT were to expand the availability of its OSS, consistent with that of Bell Atlantic, Z-Tel could support a finding that SWBT is indeed providing OSS access in Texas consistent with the requirements of sections 271." Z-Tel Comments at 4.

91. SWBT previously responded to MCI WorldCom's complaint about system availability. Ham Reply Aff. ¶¶ 144-147. SWBT is still investigating the possibility of expanding its OSS hours of operations as requested by MCI WorldCom's CLEC Change Request. In the mean time, SWBT's OSS are available every day of the week for up to 17 hours per day, depending on the interface and the day of the week. Ham Reply Aff. Attach. E. These hours of system availability are substantially the same as those for SWBT's own retail operations and provide the "prime time" availability approved in the New York Proceeding. Id. ¶¶ 144-145; see also New York Order, 15 FCC Rcd at 4030, ¶ 155. SWBT has an outstanding record of system availability during the scheduled hours, ensuring that the scheduled down time is virtually the only time its systems are unavailable. See App. B, Tab 2, at 3a-4a (PM 4); see also New York Order, 15 FCC Rcd

at 4030-31, ¶ 156 (finding important that "Bell Atlantic's interfaces were generally available as scheduled").

EDI Capacity and Scalability

92. AT&T repeats its allegation that SWBT's systems do not have sufficient capacity. Chambers/DeYoung Supp. Decl. ¶¶ 146-151. AT&T continues to portray this situation as a SWBT capacity issue, when in fact AT&T admitted its own internal capacity constraints, which forced it to change (suddenly and without notice) from "real-time" request flows to batch files. Ham Reply Aff. ¶ 118. It is unreasonable to expect a system that has been operating as "real-time" to handle large scale batch processing efficiently without special arrangements. Id. 126.

93. SWBT responded in detail to this unsubstantiated charge in my reply affidavit. Id. ¶¶ 115-128. AT&T persists in misrepresenting the facts by its incessant portrayal of its own internal capacity problems as SWBT's processing problems. In repeating its allegation, AT&T fails to mention that its own internal system capacity constraints and its sudden and unannounced change in the method it uses to submit service requests initiated the need for the 500-files-at-a-time processing pace. AT&T fails to mention that it agreed to the "paced" plan of submitting 500 files at a time. Id. ¶ 123. AT&T also fails to mention that "real time" processing was implemented at the urging of CLECs involved in the Collaborative Process (including AT&T), with great effort and expense on the part of SWBT. Id. 126. Finally, and most notably, AT&T fails to mention that the situation is no longer occurring.

94. In fact, AT&T distorts the facts by continuing to imply the situation is still occurring when it states: "SWBT has not altered its 500-order-per-hour processing limitation..." Chambers/DeYoung Supp. Decl. ¶ 147. The truth of the matter is SWBT removed its "throttle" for AT&T orders as of 3:10 p.m. March 2, 2000. Nancy Dalton of AT&T was advised of this development by Dave Young of SWBT.

95. If AT&T has some basis on which to found its allegation that the 500-order-per-hour throttle is still in effect, it fails to present that basis in its supplemental reply declaration. Instead it relies on information cited in the Dalton/DeYoung Reply Decl. filed January 31, 2000, at a time when the 500-orders-per-hour throttle was mutually agreed upon.

96. AT&T claims the Request For Proposal ("RFP") by the Missouri Public Service Commission ("MPSC") indicates concern with capacity test data from Telcordia's test. Id. ¶ 148. AT&T completely distorts the intent of the RFP. The MPSC merely wants to ensure that Telcordia's capacity test accounted for Missouri's commercial volumes. The MPSC in no way impugns Telcordia's capacity test as it relates to the state of Texas. In fact, Amendment #002 states the contractor shall first review the results of Telcordia's capacity test and make a recommendation as to whether the test accounted for Missouri's volumes. If, after analysis, the recommendation is that SWBT's OSS has sufficient capacity to process Missouri's volumes, no further actions will be necessary.

97. Contrary to AT&T's allegations, there are not nor have there been any capacity issues with SWBT's OSS. Id. ¶¶ 149-151. AT&T misrepresents the performance of SWBT's MVS system during the capacity test. While the planning threshold for MVS is 85%, it is based on the *average* of the on-line day. SWBT's average for the day of the test was approximately 79% - well below the MVS planning threshold. SWBT has also provided

documentation to the TPUC Staff by the vendor of the MVS system (IBM) that the operating system is capable of running at 100% without impact to the end users. This is the nature and design of MVS.

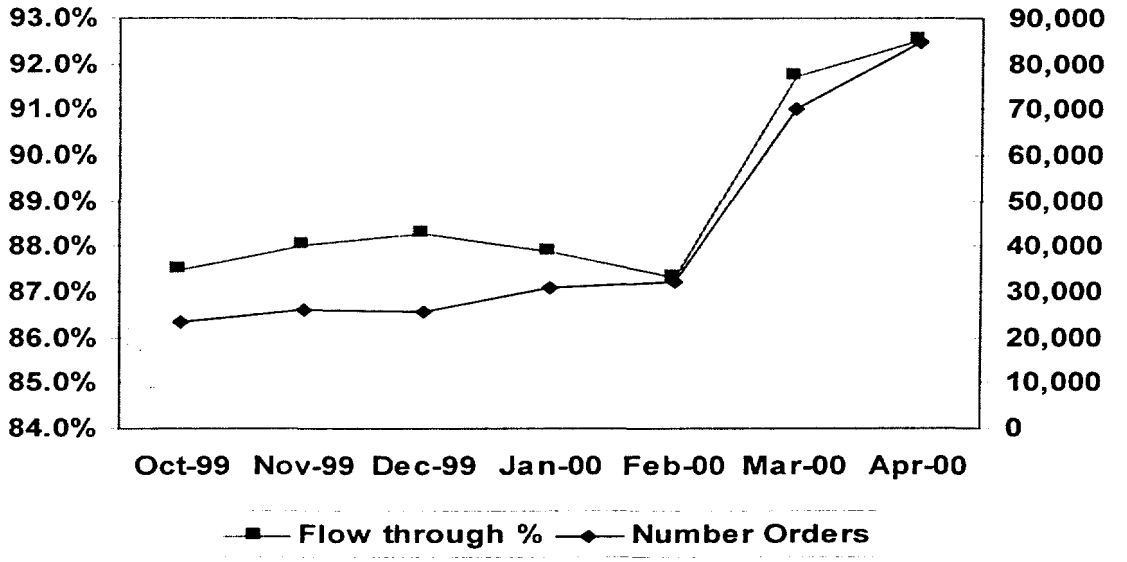
98. AT&T again misrepresents the implementation of a new metric as something SWBT has failed to do. Id. SWBT has collected and provided the data for the special study requested as part of Telcordia's recommendation for MVS scalability. This includes a new aspect of the data to assess pre-order transaction times. The data collected has been studied by SWBT. Telcordia has not yet completed its analysis of the data.

99. AT&T constantly attempts to cast doubt on the ability of SWBT's OSS to process CLEC volumes. However, AT&T has yet to come up with any evidence of a problem. SWBT performance measurement results show the high availability and performance of SWBT's OSS under increasing capacity demand.

LEX Flow Through

100. Although AT&T claims that SWBT ignores flow through on LEX, the record indicates otherwise. Chambers/DeYoung Supp. Decl. ¶¶ 107-109. SWBT gave flow through figures for the top ten LEX users over a six-month period. Ham Aff. ¶ 129. SWBT supplied order-specific flow through rates for both EDI and LEX. Ham Aff., Attachment X-2, Ham Reply Aff., Attachment F, and updates that information with March and April data in Attachment Q to this supplemental reply affidavit. SWBT provided evidence of the percentage of MOG eligible orders in both EDI and LEX. Ham Reply Aff. ¶¶ 75, 80.

101. In fact, SWBT's LEX flow through rates have generally risen steadily, even as volumes have increased, as evidenced below:[26]



	Volume of Orders	% Flow Through LEX	% Flow Through Retail
Oct-99	23,368	87.5%	91.0%
Nov-99	26,181	88.0%	91.3%
Dec-99	25,707	88.3%	92.0%
Jan-00	31,015	87.9%	91.9%
Feb-00	32,101	87.3%	90.4%
Mar-00	70,097	91.7%	89.7%
Apr-00	84,691	92.5%	89.4%

102. In every case within the past seven months, CLEC users of LEX have experienced flow through within 4% of flow through experienced by SWBT's retail service representatives. Furthermore, LEX flow through has exceeded retail flow through in both March and April 2000.

[26] Data source is PM 13, Flow Through data, and can be found on the CLEC Website.

OSS Performance Measures

103. AT&T cites the fact that SWBT's provisioning accuracy for CLECs was less than provisioning accuracy for retail in February as "proof" that SWBT's OSS are not operationally ready. Id. ¶¶ 4, 9, 128. The explanation for the out of parity results in February and March can be found in the supplemental reply affidavit of William Dysart, ¶ 61. However, for seven of the last nine months (for which SWBT has measured its retail provisioning accuracy), CLEC provisioning accuracy has been better than parity. In April 2000, CLEC provisioning accuracy was 99.0%, while SWBT's retail provisioning accuracy was 93.9%. Finally, CLEC provisioning accuracy has been measured at 95% or higher for ten months within the past year, whereas retail provisioning accuracy has never been measured higher than 94.8%. One or two months out of parity in no way indicates a systemic problem and therefore does not warrant a finding of noncompliance. New York Order, 15 FCC Rcd at 4045-46, ¶ 176. The FCC noted that it does not hold an ILEC to a standard of perfection. Id.

104. Performance Measure ("PM") 6-07 averaged 5.6 hours to return FOC via EDI in March, but averaged approximately 0.73 hours for the previous six months and averaged 1.4 hours in April. PM 8-02 averaged 8.11 hours to return mechanized completions via EDI in March, but averaged less than 0.3 for the previous eight months and averaged 0.03 hours or 1.8 minutes in April. PM 11-02 averaged 6.03 hours in March, but averaged approximately 0.56 hours for the previous ten months and averaged 0.37 hours or 22.2 minutes in April. Although these three diagnostic PMs were affected, the overall PMs met or exceeded the benchmarks in March. For example, PM 5-07 (Percent FOCs received within 5 hours) was 95.1%; PM 7-02 (Percent Mechanized Completions

returned within 1 hour) was 98.9%; PM 10-02 (Percent Mechanized Rejects Returned within 1 hour...) was 99.3%. The aberrational data for all three of these measures in March were caused by the same incident. In March, AT&T requested a resend of its files (of approximately 80-90 transactions) because certain returned LSRs were missing data. Ultimately, AT&T determined that they had made a programming change and were not passing the data to SWBT.

105. Normally, if a CLEC requests resends of FOCs, SOCs and Rejects, the request comes within a few days of the original transmission. SWBT will match duplicates by PON or LSR number, and will use the end date off the first transmission for its PM calculations. In this particular case, AT&T waited approximately six weeks before requesting a resend, so the transmission end dates were in different months. Because these transmissions occurred in different months, SWBT did not know a resend had occurred and therefore could not drop the second date – creating a time to respond of 45,455 minutes, instead of the 11 minutes it actually took to reject the LSR. The average FOC and SOC time was inflated for the same reason. SWBT has resolved similar potential situations in the future by marking the records when they are loaded and this was done for April results.

Miscellaneous Issues

106. AT&T complains that SWBT does not allow a CLEC to submit a single LSR for a multiple-line customer. Chambers/DeYoung Supp. Decl. ¶ 122. AT&T was informed by its Account Manager that a CLEC can submit a single LSR for a multiple-line customer when it is for the same end user at the same address and the TNs are billed together. However, if an end user has more than one account at the same address and the accounts

are billed separately, a separate LSR must be submitted for each separate account in parity with SWBT's retail operations. In SWBT's retail environment, retail service representatives are required to create a separate service order for each separate account.

107. AT&T alleges this practice places discriminatory burdens on AT&T, whose systems are not designed to split an order from a customer with multiple SWBT accounts into separate LSRs. AT&T further explained that it is attempting to attract customers with multi-line accounts to AT&T by offering a discount if the customer switches all its lines to AT&T, encompassed in a single account and a single bill. However, because SWBT does not allow a single LSR, AT&T must use a multi-step manual process that "completely eviscerates the savings that allowed AT&T to be able to offer the discount in the first place." Id. ¶¶ 121, 123. Compliance with the Act requires SWBT to offer nondiscriminatory access to its OSS; it does not require SWBT to design its OSS to accommodate every CLEC's individual system needs.

108. Before AT&T began marketing this special discount to end users it hoped to attract, it should have done its 'homework" and discovered how the conversion would be most efficiently accomplished. SWBT is not responsible for AT&T's (or any other CLEC's) marketing mistakes. Or if AT&T knew that SWBT would not accept a single LSR for multiple-line accounts before its marketing campaign, it should not now be heard to complain that SWBT's procedures do not permit AT&T to take financial advantage of the discount it chose to offer.

109. AT&T complains that SWBT makes unannounced calling scope changes. Id. ¶¶ 29-31. Since 1995, under directive of state law, Extended Local Calling ("ELC") is a lengthy process, often taking up to a year. Activities include voting within the communities and

there are stringent requirements to post notifications in newspapers so that end users will be alerted of proposed filings. Additionally, the proposed filings have associated comment periods and are noted in the Texas Register. The Texas Commission approves these filings in open meetings and within six months following TPUC approval, the changes are implemented. It hardly seems possible that with newspaper notifications, TPUC publications, open meetings, etc. that a calling scope change could be accomplished completely "unannounced." Even with all these notification venues, SWBT agreed in February 2000 to send additional notification by Accessible Letter and at least two letters have been sent since that agreement was made. However, SWBT does not agree to provide NPA/NXX information to the CLECs. CLECs have access to the Local Exchange Routing Guide ("LERG") and are able to obtain NPA/NXX information via the LERG, which is how SWBT obtains its NPA/NXX information.

110. ALTS/CLEC Coalition complains that each CLEC receives a password for the CLEC Website and that when an employee leaves, that employee can still access the CLEC's confidential information on the website. ALTS/CLEC Coalition is concerned that if each individual employee has an individual password and the CLEC is forced to administer its employees' passwords, it would place a burden on the CLECs. ALTS/ CLEC Coalition Joint Brief at 16-17. For the CLEC Website, there is only one company ID and password per CLEC that is used by any user in that company to gain access to the protected sections of the site. If there is a concern that an employee, who left the company, might misuse the CLEC's password to access confidential information, it is the CLEC's responsibility to request that its password be reset for the CLEC Website. This would change the password for all of that CLEC's users. This is different from the IDs and

passwords assigned for the OSS, which are unique to each individual user. In this situation, it is the CLEC's responsibility to notify SWBT when a user leaves the company so that User ID and password can be deleted.

CHANGE MANAGEMENT

CMP Compliance

111. Telcordia found that SWBT generally followed its Change Management Process; that inconsistencies within the process did not undermine the achievement of its general intent; and that the process followed was effective. CMP Report at 5, Supplemental CMP Report at ES-1, (provided as Ham Attachs. LL and MM, respectively). The FCC has found the existence of an adequate change management process and evidence of adherence to this process an important consideration in a 271 application. New York Order, 15 FCC Rcd at 3999-4000, ¶ 102.

112. It was noted that Bell Atlantic's competing carriers had a substantial role in the development of Bell Atlantic's change management process. Id. at 4000-01, ¶ 104. SWBT first made its CMP available to the CLEC community in June 1998, a CMP developed by working cooperatively with CLECs. In September 1999, a revised CMP was negotiated with participating CLECs in conjunction with TPUC Project 20400 and Docket 19000. This revised CMP is the current operating process, and was provided as Attachment NN to my initial affidavit. Ham. Aff. ¶ 307. In addition, the CMP is being updated through a collaborative process with SBC and the CLECs. The participants in this process are working to develop a 13-state CMP document, which is scheduled to be finalized and released in June 2000.

113. Bell Atlantic established a forum where representatives meet to discuss upcoming interface changes as well as the change management procedures. New York Order, 15 FCC Rcd at 4001-02, ¶ 106. SWBT holds CMP meetings monthly, actively solicits input from CLECs for agenda items, provides copies of its high-level 12-month development plan, conducts walk-throughs of each new release with CLECs to respond to any questions or clarifications of release requirements, and supports various sidebar meetings. Ham Aff. ¶¶ 330-337.

114. Bell Atlantic's basic change management process is memorialized and set forth in a single document and the document is readily available to CLECs via Bell Atlantic's web page. New York Order, 15 FCC Rcd at 4002, ¶ 107. SWBT's CMP is also memorialized in a single document that is posted on SWBT's CLEC website, where it is readily available to all CLECs. Ham Aff. ¶ 307. Like Bell Atlantic, SWBT also posts and maintains a database that tracks the progress of each specified CLEC Change Request, which is also posted on SWBT's CLEC website. Id. ¶¶ 324, 335-336.

115. Bell Atlantic's change management process included a method for dispute resolution. New York Order, 15 FCC Rcd at 4002, ¶ 108. Under Bell Atlantic's guidelines, CLECs are allowed to appeal to upper level management at Bell Atlantic or to raise issues before the New York Commission staff. Id. Under SWBT's dispute resolution, CLECs are also allowed to appeal to upper management and to raise issues before the TPUC. However, SWBT also provides an additional step that permits CLECs to postpone implementation of a release. If, for any reason, the CLECs do not feel comfortable with deploying a particular change to a release or deploying the entire release, the dispute voting provision of SWBT's CMP gives CLECs an opportunity to delay the release. The dispute voting

(also referred to as "go/no-go vote") provision makes SWBT's CMP more CLEC-friendly by giving all affected CLECs a voice in making the decision to go forward with release implementation. To date, the go/no-go vote was invoked only once, with the August 1999 release. When the vote was actually taken, all participating CLECs voted to "go." Ham Aff. ¶¶ 345-351.

116. The FCC concluded that Bell Atlantic showed its change management process in New York provided an efficient competitor with a meaningful opportunity to compete for the following reasons: 1) evidence of competing carrier input in the design and continues operation of the change management process; 2) the memorialization of the change management process in a basic document; 3) the availability of a separate forum for change management disputes; 4) and the availability of a stable testing environment. New York Order, 15 FCC Rcd at 4004, ¶ 111. SWBT has demonstrated that its CMP also provides an efficient competitor with a meaningful opportunity to compete by offering evidence as to its satisfaction of the four factors above (SWBT's test environment is discussed below).

117. As in Bell Atlantic, CLEC commentors express concern with SWBT's ability to adhere to notification timelines and allege that SWBT issues too many "emergency / exception" changes. Id. at 4004-05, ¶ 112.

118. AT&T also alleges SWBT's noncompliance with the CMP. Chambers/DeYoung ¶¶12-28. In fact, the evidence is to the contrary. SWBT has followed the CMP, even with regard to exceptions. CMP Section 6.2 provides for shorter notice intervals, or "exceptions." SWBT has acknowledged that it had to and will have to use exceptions for releases in January, May and July 2000. However, the exception releases resulted from

CLEC-initiated regulatory mandates. SWBT responded to these initiatives as quickly as it could. Unfortunately, CMP timeframes were passed on many of these items before they were requested. The volume of expedited work led to delays in other planned release activities. Ham Supp. Aff. ¶¶ 55-65. Further, the CLECs and SBC are currently discussing timeline alterations to accommodate certain process improvement initiatives that require shorter timeframes than allowed by today's CMP.

119. The FCC notes that without timely notification and documentation, competing carriers are unable to modify their existing systems or develop new systems to maintain access to the Bell Operating Company's ("BOC's") OSS. New York Order, 15 FCC Rcd at 4005, ¶ 113. Other than AT&T's repeated allegations that SWBT's unannounced changes that affected its customer billing (Chambers/ DeYoung Supp. Decl. ¶ 28), which were previously addressed in the reply affidavit of John Locus, no CLEC even attempts to offer proof that SWBT has caused any problems by providing late or no change notices. Moreover, AT&T's allegations are in regard to changes made in SWBT's legacy billing systems, not the result of an EDI/LASR release implementation. *See generally,* Locus Reply Aff.

120. While the FCC acknowledged that Bell Atlantic's performance did not meet the standards for change management notification, they concluded that Bell Atlantic's notification was timely enough to allow an efficient competitor a meaningful opportunity to compete. New York Order, 15 FCC Rcd at 4008-09, ¶ 118. SWBT has offered convincing evidence that its Change Management Process and its change management practices offer an efficient CLEC a meaningful opportunity to compete.

Versioning

121. As mentioned in all my previous affidavits, SWBT has committed to support versioning in its application-to-application interfaces. Ham Aff. ¶ 352, Ham Reply Aff. ¶ 162, Ham Supp. Aff. ¶ 61. As explained previously, SWBT's implementation of versioning was always intended to take effect with the first release in 2000 that impacts a CLEC customer from a LSR perspective. When LIDB was ordered by the TPUC in January, versioning was postponed until July because the implementation of versioning is a very complex undertaking. The upcoming May 27 EDI/LASR release began as an internal process improvement, although enhancements from the Advanced Service Plan of Record, line sharing, and CLEC affecting process improvement edits are now scheduled.

122. SWBT continues to maintain that versioning will be implemented with the July 22, 2000 EDI/LASR release. Ham Reply Aff. ¶ 163, Ham Supp. Aff. ¶¶ 61-63. Accessible Letter CLECSS00-057, dated April 6, 2000 is provided as Attachment R. As mentioned previously, the letter provides an updated document that is posted in the CLEC Handbook, which explains the joint responsibilities applicable to versioning. The implementation of versioning will require SWBT and CLECs to exchange information regarding release versions and timeframes for each release. Ham Supp. Aff. ¶ 63.

123. SWBT reiterates that its approach to versioning prior to OBF standards is to adopt the type of versioning proposed by the CLECs at the July and August 1999 CMP meetings. Specifically, SWBT will support two versions, the current version and the previous version (including "dot"[27] releases) of software for its EDI ordering and for its DataGate and EDI/CORBA pre-ordering interfaces.

[27] A "dot" release is a release that provides only a SWBT-upgraded EDI/LSOG version. A "major" release is a release that provides a basic, industry-upgraded EDI/LSOG version.

124. The only mention of versioning in the FCC's approval of Bell Atlantic's 271 application is as follows: "Moreover, in order to ensure that competing carriers are not forced to test and cut over to a new industry standard release prematurely, Bell Atlantic maintains a pre-existing version after issuing a major new release rather than switching from one version to the next." New York Order, 15 FCC Rcd at 4003-04, ¶ 110. Therefore, Bell Atlantic only maintained two versions of basic EDI/LSOG versions ("major" releases) at the time of its filing. SWBT has offered no EDI/LSOG version other than version 8, which was implemented August 10, 1998. All EDI/LASR releases since August 1998 have been "dot" releases, and not available for versioning purposes under Bell Atlantic's approach. The May 27, 2000 release is a "dot" release and the July 22, 2000 release is a "dot" release. Therefore even if SWBT had implemented versioning (using Bell Atlantic's approach) in January 2000 – CLECs still would not have had the option of remaining with the "old" version rather than switching to the "new" version until some unspecified date *after* July 2000.

125. AT&T argues that parity of access cannot be said to exist as long as CLECs remain subject to a "flash cut implementation" approach that SWBT does not experience in its retail environment. Chambers/DeYoung Supp. Decl. ¶ 34. SWBT's retail operations are not afforded the luxury of versioning. SWBT's retail interfaces are upgraded on a flash-cut implementation approach in parity with current EDI enhancements. SWBT retail is given the opportunity to train users and pre-test software for new upgrades in the same manner CLECs have the opportunity to train users and pre-test software prior to an EDI/LASR release. Furthermore, SWBT provides ample time for testing, if CLECs take

advantage of this opportunity to test, any potential risk from "flash-cut" implementation will be greatly reduced.

Test Environment

126. A critical function mentioned in passing by the FCC is the test environment's ability to serve CLECs during the EDI implementation phase of EDI testing. SWBT's test environment does not cater solely to commercially productive EDI CLECs, which use the test environment for release testing. In fact, SWBT's test environment attempts to take the most critical functionality required in both EDI testing situations (implementation and release testing) and strategically merge these functions into one test environment.

127. AT&T continues to allege that SWBT fails to provides CLECs with a test environment that "mirrors" the production environment. Chambers/DeYoung Supp. Decl. ¶ 43. AT&T further suggests the reasons SWBT's test environment "fails" to "mirror production is because orders do not flow through for SORD distribution and status notices are not fully automated. Id. Contrary to AT&T's allegation, SWBT's test environment evaluates the ability of an LSR to flow through to SORD order creation. The TPUC has established performance measures in SWBT's production environment that thoroughly track flow through and response times and are designed to demonstrate nondiscriminatory access in these areas. SWBT's test environment was not designed to test flow through or response times but to test application functionality. Although test system response time may in some cases be slower than production, the functionality of SWBT's test environment is the same as its production environment and returns data in the identical fields and format. Ham Reply Aff. ¶ 168.

128. SWBT's test environment mirrors SWBT's production environment as defined by AT&T in its comments to the FCC on Bell Atlantic's 271 application.[28] In contrast to Bell Atlantic's interim environment at the time of the KPMG test, SWBT's test environment, which was implemented in November 1999, is dedicated solely to CLECs. Ham Reply Aff. ¶ 170. Furthermore, SWBT has provided a detailed "Joint Release Test Plan Template" ("RTP"), which was filed with the TPUC in October 1999, and was provided as Attachment RR to my initial affidavit. The RTP lays out the responsibilities for each participant of the joint release testing, including the CLEC, the SWBT Test Team, and the CLEC Account Teams. Ham Aff. ¶ 339.

129. Because SWBT's test environment mirrors SWBT's production environment, changes to the test environment only occur when a production fix is applied or a new release is implemented. The only time the software in the test environment is *newer* than software in the production environment is during a new release testing period. AT&T cites an incident "when SWBT rejected test orders from AT&T because it had failed to implement in the test environment changes that it made to the production environment." Chambers/DeYoung Supp. Decl. ¶ 44. However, AT&T fails to note that this incident occurred during the December 1998 release testing, nearly a year before the implementation of SWBT's current test environment. Furthermore, in December 1998, no CLEC was in commercial production using EDI.

130. AT&T complains about a more recent incident that occurred because certain tables that had been updated in the test environment had not been updated on a timely basis in the

[28] AT&T claimed Bell Atlantic test environment "failed" to mirror its production environment because "the testing was performed using software that was *newer* than that used in the production environment." In addition, Bell Atlantic has not adequately defined or documented testing procedures. Crafton/Connolly Aff. ¶ 231. Additionally another reason given by AT&T for Bell Atlantic's failure to fully mirror production was because its "interim" CLEC

production environment. Id. This incident was not the result of programming errors, but in the timing of applying updates to reference tables. Even though this was an isolated incident, steps have been taken to improve SWBT's change management process for these tables. SWBT does not claim perfection in managing all of the changes associated with enhancing and maintaining the numerous programs, databases, tables, interfaces, and communications channels required to provide inter-connection capabilities. When an area of weakness is identified, SWBT takes action to improve the process or component. If the few isolated problems are taken in context of the thousands of component changes, SWBT's results compare very favorably with industry results.

131. The FCC approved of Bell Atlantic's stable testing environment. New York Order, 15 FCC Rcd at 4002, ¶ 109, 4009, ¶ 119. SWBT's test environment is stable, is devoid of all outside influences, and is utilized solely for CLEC joint testing. The FCC approved the fact that CLEC receive an adequate opportunity to test Bell Atlantic OSS changes prior to implementation. Id. at 4009, ¶ 119. CLECs also receive an adequate opportunity to test SWBT's OSS changes prior to implementation. The FCC based its conclusion that Bell Atlantic provides a stable test environment on the experience of the competing carriers that used Bell Atlantic's "permanent" test environment without difficulty for its October 16, 1999 software release. Id. at 4009, ¶ 120. Two CLECs used SWBT's test environment to test the January LIDB release. (Although AT&T may point to the incident during LIDB testing where the production reference tables were not updated timely enough, even the FCC noted that in the evaluation of Bell Atlantic's October 1999 test period, one exception was discovered wherein the results of the production

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test environment was not a physically separate environment and orders did not flow through. Id. 233. The applicable pages of this affidavit are provided as Attachment S.

environment did not match the results in the test environment. Id.) One CLEC, *** *** completed regression testing for SWBT's May 1999 EDI/LASR release; additional CLECs are still in the process of testing the May release. In addition, ten CLECs used SWBT's test environment for their EDI implementation; five of these same CLECs used the test environment to test new products (e.g., UNE or Resale, Hunting, testing new software, etc.) Finally, nine CLECs are currently utilizing SWBT's test environment for their EDI implementation.

132. The FCC approved of the fact that Bell Atlantic offered test decks of representative pre-ordering and ordering transactions. Id. at 4009-10, ¶ 121. SWBT permits each CLEC to devise its own test scenarios based upon its own business requirements. However, SWBT has demonstrated that it will provide test scripts for a requesting CLEC specific to the new functionalities a CLEC desires to implement. *** *** In fact, SWBT states in the RTP that SWBT will provide a worksheet of test cases (generic in nature) for CLECs' use. Despite AT&T's allegation that CLECs cannot assume the test accounts used in previous joint testing will be available for new release testing (Chambers/DeYoung Supp. Decl. ¶ 45), once an account has been established for a CLEC on the test environment, it remains available. In fact, no test accounts have ever been removed to date. SWBT requests CLECs provide information on their test scenarios before new release testing to ensure the appropriate types of accounts are available in order to execute the requested testing. This avoids the delays incurred when a CLEC submits a test order against an account that does not have all the required features for that test scenario. In conclusion, SWBT's test environment

This concludes my affidavit.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on May 16, 2000.

Elizabeth Ham

ELIZABETH HAM
VICE PRESIDENT
LONG DISTANCE COMPLIANCE

STATE OF OKLAHOMA
COUNTY OF OKLAHOMA

Subscribed and sworn to before me
this 16 day of May, 2000.

Helen L Scott

Notary Public

My Commission Expires: August 28, 2000